



THE CITY-COUNTY OF Butte-Silver Bow

Superfund Division

November 13, 2018

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RE: October 2018 Monthly Report of Activities
Butte Priority Soils Operable Unit
Unilateral Administrative Order (UAO) – EPA Docket No. CERCLA-08-2011-0011

Ladies and Gentlemen:

Pursuant to Paragraph 42 of the above referenced Order, Butte-Silver Bow submits the attached Monthly Report for activities performed at the Silver Bow Creek/Butte Area Superfund Site, as part and on behalf of the Group 1 Respondents. This monthly report covers work activities for October 2018.

Please contact me (497-6264) if you have any questions about the information in the report or need additional information about Butte-Silver Bow's work activities. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Julia M. Crain".

Julia Crain
Superfund Program Data Administrator
Butte-Silver Bow Planning Department

Attachment: Monthly Report

CC: Josh Bryson, AR Project Manager
BSB Personnel
E-Mail version sent to List-Serve

Monthly Report – October 2018

Butte Priority Soils Operable Unit

Silver Bow Creek/Butte Area Superfund Site

Unilateral Administrative Order (EPA Docket No. CERCLA-08-2011-0011)

As directed by Paragraph No. 42 of the *Unilateral Administrative Order for Partial Remedial Design/Remedial Action Implementation and Certain Operation and Maintenance at the Butte Priority Soils Operable Unit/Butte Site (hereinafter, the Order)*, the City and County of Butte-Silver Bow provides this monthly report on work activities under the Order. The work activities described in this report are consistent with the directives contained in the Order/Remedial Action Work Plan, and cover those efforts performed by Butte-Silver Bow as part of the Group 1 Respondents, during October 2018.

I. Operations and Maintenance Activities

A. Source Areas/Butte Reclamation Evaluation System (BRES)

Routine O&M. In October, Source Area maintenance crews continued performing maintenance activities across reclaimed areas of the Butte Hill. This past month, BSB Crews completed routine O&M tasks including trash pickup and disposal, fence repairs, and stormwater sediment basin, culvert, and inlet cleanout. Specific site work included:

- BRES Site 56, Buffalo Dump – Repaired areas of exposed waste discovered during the 2017 site evaluations. Four cubic yards of waste was removed and disposed of at the MWR. Top soil was imported, and the areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 55, Kennedy Dump – Constructed a ditch along the north perimeter of the site to eliminate future erosion damage cause by sheet flow from Pacific street. The ditch was lined with 6-inch minus material. Boulders were added adjacent to the swale to prevent vehicle damage to the sight.
- BRES Site 55, Kennedy Dump - Repaired barren areas discovered during the 2017 site evaluations. Four cubic yards of waste was removed and disposed of at the MWR. Top soil was imported, and the areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 53, Poulin Dump – Extended the existing rock lined ditch to prevent erosion damage to the site. Imported 16 cubic yards of 6-inch minus material.
- BRES Site 60, Mountain Con Mine Yard – Repaired damaged fencing and replaced a lock that has been removed.
- BRES Site 120, Bonanza Dump – excavated five subsidence areas located throughout the site. After excavation, it was determined that the areas were not mining related. The areas were mounded with existing materials on-site for future monitoring for further subsidence.
- BRES Site 57, Little Mina 1 – disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 59, Little Mina - – disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site CB8, Catch Basin 08 – prepared planting areas throughout the site. Native tree, plants and shrubs were planting in coordination with the Montana Tech Native Plants Program.
- BRES Site 181, Mountain Con 3 - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 61N & 61E, Mountain Con Dump North and East - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 36, La Platta Gulch - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.

- BRES Site 174, Buffalo South - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 180, Tullamore Dumps - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 46, Missoula Mine - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 45, Garfield - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 33, Jennie Dell - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.
- BRES Site 36, La Platta Gulch - disked soils that had been imported previously to prepare for seeding. The areas were seeded with Pal 2015 in accordance with the BHRS.

BRES Program. In October, BSB staff submitted the final 2017 Corrective Action Plans and continued quality assurance on the 2018 Site Evaluation data. This information will be incorporated into a Summary Report for submittal in Fall of 2018.

Vegetation and Weed Controls. No weed control activities were completed in October 2018.

Institutional Controls (ICs). Butte-Silver Bow continues to manage its responsibilities to the Institutional Controls Program through education and training in Best Management Practices for stormwater and sediment controls, excavations of hazardous waste, and access to the Mine Waste Repository. B-SB personnel work closely with local utility companies including NorthWestern Energy, Charter/Spectrum, Qwest and others to coordinate Street Opening permits, Excavation & Dirt-Moving permits, and others.

Excavation Review and Oversight. BSB personnel continue to monitor excavation and dirt-moving activities throughout the basin, including monitoring permitted projects issued in previous months. Coordination with contractors requires continued monitoring of access to the Mine Waste Repository. BSB personnel issued 26 Excavation and Dirt-Moving Permits during the month of October.

9 permits were issued for properties in BPSOU:

- Lots 1-2, Empire and Alabama – New House
- 1508 Dunn Avenue – Home Expansion
- 918 W. Copper – Utility Repairs/Maintenance
- 900 Block S. Colorado/S Main – Utility Repairs/Maintenance
- Main and Iron; Main and Fremont – Utility Repair/Maintenance
- 15 W. park – Utility Repairs/Maintenance
- 1400 Missouri – House Addition
- 53 E. Park Street – New Water Service
- 319 N. Montana – Retaining Wall repair

17 permits were issued for properties outside of BPSOU:

- 202 Telemark Lane – Pole Barn
- Western Boulevard from Tennyson to Meadowlark Lane – Utility repairs/maintenance
- 3545 Oregon – Footings for garage
- 434 Cowpoke Trail – Foundation
- Meadowlark, Arizona, Western, and Electric – Fiber Optic Utility, Grading Road, Stripping Top soil
- Shirley Way – Footings
- 55 Basin Creek Road – Utility repairs/maintenance

- 102 B North Parkmont – Posts/Poles for pole storage building
- 106 Larkspur – Footing/foundation
- Fairmont Street Lots 2, 3, 7, 8 – Footing/foundation for new house
- 215 Little basin Creek Road – Foundation
- 1299 Iris Ridge – Detached garage
- 2611 Amherst – Sewer Replacement
- 1935 Dewey Boulevard – Home Addition
- 180 Pinto Lane – Garage

Mine Waste Repository Maintenance. The Mine Waste Repository continued operation with all active dumping directed to the lower, eastern bench which continues to be monitored and maintained on a regular basis.

- Removed materials from the lower deck utilizing a D-7 bulldozer 2 times in October

B. Storm Water Operations and Maintenance Activities

During October 2018 standard, routine work activities were completed. In addition to inspections and monitoring of facilities, BSB Crews completed the following:

- Continuous monitoring of Syndicate Pit, CB8, CB9 and HDDs;
- CB8 By-pass screen cleaned daily.
- Completed the Fall inspections of stormwater facilities in accordance with the Stormwater O&M Plan.
- Dewatered CB08 and 09 to provide capacity for spring runoff.

Superfund Storm Water Structures Inspections: BSB personnel have completed fall stormwater inspections.

Superfund Storm Water Structures Operations and Maintenance Plan: Butte-Silver Bow has received approval on this plan and will resubmit pending two changes based upon EPA comment.

MPDES Storm Water Permit Assistance & Monitoring – MS4: MPDES Storm Water Permit Assistance & Monitoring – MS4: Butte-Silver Bow and its consultants continue to implement requirements of its Municipal Separate Storm Sewer System (MS4) permit. The MS4 permit requires the BSB develop a Storm Water Management Program (SWMP) that addresses six control measures: public education, public involvement, illicit discharge detection and elimination (IDDE), construction site storm water control, post-construction site storm water control, and pollution prevention/good housekeeping. Activities completed under each control measure are detailed below:

- Monitoring, Recording and Reporting Requirements for the General Permit.
- Butte-Silver Bow Public Works and its consultants provide engineering support and assistance in reviewing storm water design plans for proposed developments in Butte, as required by the City-County Storm Water Ordinance. Assistance regarding storm water requirements was provided to potential developers as requested.

C. Water Quality District Activities

Water Quality District Completed the following tasks in October 2018:

- Continued work with Montana Bureau of Mines and Geology (MBMG) to discuss the upcoming expansion of the domestic well sampling program.
- Reviewed MBMG Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP). Agency review is ongoing, and comments are anticipated for early November.
- In coordination with MBMG, performed the sampling of the domestic wells associated with the Clark Tailings/Old Landfill Controlled Groundwater Area. Organic results have been received and reviewed with no drinking water standard exceedances. The inorganic results indicated no

exceedances for the Contaminants of Concern. Letters to property owners are currently being drafted and will include sampling results.

- In coordination with the BSB Health Department and Atlantic Richfield, WQD Staff provided property owners with information regarding the siting of potential well near the Rocker Controlled Groundwater Area.
- Attended presentation on “Population-based Analysis of Health Risks Associated with Residence in Montana Past & Present Mining Communities” by Dr. Suzanne McDermott.
- Participated in duties related to the Health Study Working group including attending work group meetings and facilitating small group conversation during the second public meeting.
- Performed monthly review of the MBMG BMFOU report for September 2018.

D. GIS Activities

Primary work in the reporting period included:

- Imported BSB BRES quick reference and BSB BRES manual into the database and prepared for incorporation into the Solid Media Management Program.
- Prepared a parcel and ownership map for areas of property located near Blacktail Creek.
- Prepared a shapefile of the BSB Excavation Control District from the Ordinance Map for Atlantic Richfield.
- Produced map of Whiskey Gulch west of Montana Tech using 2017 aerials for Matt Vincent.
- Performed analysis of Superfund site boundaries as they relate to properties located within the TIFID for Patty Hamblock at WET.
- Requested and received an updated shapefile of BPSOU-area monitoring wells from AR/TREC to update BSB source files and then plotted a map of BPSOU-wells for the County Attorney’s Office.
- Prepared a combination map of superfund structures, sites, shafts/hazards and other files and exported as KMZ for Tom Malloy.
- Exported a shapefile of headframes and shafts to Billie Marinovich, Pioneer Technical.
- Exported a KMZ of Rocker Controlled Groundwater Area to Brandon Warner, BSB Superfund.
- Began GIS analysis to prepare a list of schools with play areas and list of BSB-controlled play areas in Butte.
- Performed weekly QA/QC of Operations and Maintenance and Stormwater data entered into the BRES O&M Database.

II. Residential Metals Abatement Program

Several standard work activities continued in October, including:

- Identifying soil, attic and cap protection projects.
- Data base and GIS tracking system; progress and annual reports
- Completion statements and deed attachments for projects completed
- Re-insulating properties previously abated
- Paint inspections
- EBL investigations
- Residential soil/basement sampling
- Residential attic sampling
- Residential interior dust sampling
- Providing use of HEPA vacuums
- Providing blood lead sampling through WIC clinic and tracking blood lead results

Projects in Progress (November 2018)

1312 E. Park Place – Attic
1413 B St. – Yard
1415 B St. – Yard
830 W. Granite – Yard
510 W. Galena – Basement

Projects Completed: (October 2018)

1315 Waterline – Attic
2301 Grand – Attic
1015 Oregon – Attic
1727 A St. – Attic
121 Capitol Hill – Attic
2126 Wall – Attic
820 W. Park – Attic
825 Lexington – Attic
510 W. Galena – Yard
651 W. Granite – Yard
504 W. Galena – Yard
601 Placer – Yard
434 Colorado – Yard
E. LaPlatte Lot – Yard
414 Virginia – Yard
933 N. Main – Yard

Upcoming projects:

109 Belle – Attic
213 Virginia – Attic
1948 Grand – Attic
2932 Goodwin – Attic
655 W. Granite – Soil
830 W. Granite – Basement
123 W. Daly – Retaining wall

Projects Completed in (2018) – 101

Properties Sampled in (2018) – 202

Flyers and Postcards Sent Out (2018) – 800